

1 **STIP**  
2 **GABRIEL L. GRASSO, ESQ.**  
3 **State Bar Number 7358**  
4 **9525 Hillwood Dr., Suite 190**  
5 **Las Vegas, Nevada 89134**  
6 **(702) 868-8866**  
7 **gabriel@grassodefense.com**  
8 **Attorney for NAVARRO**

6 **UNITED STATES DISTRICT COURT**  
7  
8 **IN AND FOR THE DISTRICT OF NEVADA**

9 **UNITED STATES OF AMERICA,** )  
10 **Plaintiff,** )  
11 **vs.** ) **Case No.: 2:14-cr-00328-KJD-NJK**  
12 **ANTHONY NAVARRO,** ) **STIPULATION TO CONTINUE**  
13 **Defendant.** ) **HEARING REGARDING REVOCATION**  
14 ) **OF PRETRIAL RELEASE**  
15 ) **(THIRD REQUEST)**

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16 *Certification:* This stipulation is filed pursuant to General Order 2007-04.

17 IT IS STIPULATED between the defendant ANTHONY NAVARRO through his  
18 attorney GABRIEL L. GRASSO, ESQ., and the United States of America, through  
19 ROBERT KNIEF, Assistant United States Attorney, that the hearing regarding revocation  
20 of supervised release currently scheduled for August 21, 2017, at the hour of 9:30 a.m.,  
21 be vacated and set to a date and time convenient to this court, but no event earlier than  
22 Thirty (30) days.

23 This Stipulation is entered into pursuant to General Order 2007-04 and based  
24 upon the following:

- 25 1. There have been two previous continuances granted to the defense in this  
26 case.
- 27 2. The defendant will need additional time to resolve his criminal matter in the  
28 State of New York which is the basis for the Government's revocation  
request and will therefore impact the Court's decision.
3. The parties agree to the continuance.

- 1           4.     Denial of this request for continuance would deny the defendant sufficient  
2                 time to be able to fairly resolve his case, taking into account the exercise of  
3                 due diligence.  
4           5.     Also, denial of this request or continuance would result in a miscarriage of  
5                 justice.  
6           6.     For the above stated reasons, the parties agree that a continuance of the  
7                 hearing regarding revocation of pretrial release.  
8           7.     This is the third request for a continuance on the hearing regarding  
9                 revocation of pretrial release.

DATED this 17th day of August, 2017.

10    RESPECTFULLY SUBMITTED BY:

11  
12       /s/ Robert Knief  
13    ROBERT KNIEF  
14    Assistant United States Attorney

/s/ Gabriel L. Grasso  
          GABRIEL L. GRASSO  
          Attorney for NAVARRO

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**Case No.: 2:14-cr-00328-KJD-NJK**

**STIPULATION TO CONTINUE  
HEARING REGARDING REVOCATION  
OF PRETRIAL RELEASE**

**(THIRD REQUEST)**

16 **FINDINGS OF FACT**

17  
18 Based upon the submitted Stipulation, and good cause appearing therefore, the  
19 Court finds that:

- 20 1. The defendant will need additional time to resolve his criminal matter in the  
21 State of New York which is the basis for the Government's revocation  
22 request and will therefore impact the Court's decision.  
23 2. This stipulation complies with General Order 2007-04.

24 **CONCLUSIONS OF LAW**

- 25 1. Denial of this request for continuance would deny the defendant sufficient  
26 time to be able to fairly resolve his case, taking into account the exercise of  
27 due diligence  
28

